

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:22-cv-00451-LCB-LPA**

MARAIM RIVERA, individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

CAPITAL LINK MANAGEMENT, LLC

Defendant.

**PLAINTIFF’S RESPONSE TO
LETTER TO COUNSEL FOR PLAINTIFF**

MARAIM RIVERA (“Plaintiff”), by and through her undersigned counsel, hereby responding to the Court’s Letter to Counsel for Plaintiff [Dkt. 7] as follows:

1. On June 15, 2022, Plaintiff filed the instant action seeking redress for violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.*
2. Defendant was duly served and Defendant’s responsive pleading was due on or before July 12, 2022.
3. On July 20, 2022, the Court issued a Letter to Counsel for Plaintiff (“Letter”) advising Plaintiff that Defendant has failed to file its responsive pleading.
4. The Letter further requested that Plaintiff advise how she wishes to proceed no later than July 29, 2022.
5. Plaintiff’s counsel has previously represented other clients with claims against Defendant and knows which law firms and counsel regularly represent Defendant.
6. Accordingly, in a gesture of good faith, Plaintiff’s counsel is in the process of reaching out to each counsel that has previously represented Defendant to apprise counsel of Defendant’s failure to submit its responsive pleading in this case.

7. In the event Defendant fails to file a responsive pleading on or before August 12, 2022, Plaintiff intends on moving for entry of default and default judgment.

Dated: July 29, 2022

Respectfully submitted,

/s/ Mohammed O. Badwan
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Local Civil Rule 83.1(d) Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Mohammed O. Badwan, certify that on July 29, 2022, the foregoing document was filed electronically using the Court's CM/ECF system, which will accomplish service on all counsel of record.

/s/ Mohammed O. Badwan